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13 TICKETMASTER L.L.C.

14 UNITED STATES DISTRICT COURT
15 CENTRAL DISTRICT OF CALIFORNIA

16 TICKETMASTER L.L.C., a Virginia
17 limited liability company,

18 Plaintiff,

19 vs.

20 RMG TECHNOLOGIES, INC., a
21 Delaware corporation, and DOES 1
22 through 10, inclusive,

23 Defendants.

No. Case No. CJ 07-2534 ABC(JWJx)

Hon. Jeffrey W. Johnson

DISCOVERY MOTION

**TICKETMASTER, L.L.C.'S
NOTICE OF MOTION TO
COMPEL PRODUCTION OF
DOCUMENTS**

**[Filed Concurrently With: Joint
Stipulation Regarding Plaintiff's
Motion To Compel Production of
Documents; Declarations of Adam
Lieb, Raaqim Knight, Cipriano
Garibay, and David Tarlow;
September 13, 2007 Scheduling
Order]**

Hearing Date: April 17, 2008

Hearing Time: 2:00 p.m.

Location: Courtroom C, 8th Fl,
Spring St.

Pre-Trial Conf.: September 15, 2008

Trial Date: October 1, 2008

Discovery Cut-Off: May 23, 2008

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on April 17, 2008, at 2:00 p.m., in the
3 courtroom of the Honorable Jeffrey W. Johnson, located at 312 North Spring Street,
4 Los Angeles, California, in Courtroom C, 8th floor, Plaintiff Ticketmaster L.L.C.
5 ("Ticketmaster") will and hereby does move pursuant to Federal Rules of Civil
6 Procedure 37(a) for an order compelling Defendant RMG Technologies, Inc.
7 ("RMG") to permit inspection by Ticketmaster of documents and electronically
8 stored information. Specifically, Ticketmaster seeks an order requiring RMG to:
9 (a) produce allegedly "confidential" materials pursuant to a reasonable protective
10 order; (b) provide amended responses to the requests; and (c) produce additional
11 unprivileged, documents and electronically stored information covered by the
12 requests set forth herein.

13 Prior to filing this Motion, the parties have met and conferred pursuant
14 to Local Rule 37-1 and made a good faith attempt to resolve this dispute but were
15 unable to do so.

16 This Motion to Compel is based upon this Notice, the concurrently
17 filed Joint Stipulation Regarding Plaintiff's Motion to Compel Documents, the
18 declarations of Adam Lieb, Raaqim Knight, Cipriano Garibay and David Tarlow,
19 the pleadings and records on file in this action and such other matters as the Court
20 deems necessary and proper.

21 Dated: March 24, 2008

MANATT, PHELPS & PHILLIPS, LLP

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24 By: Don Brown / RK
25 Donald R. Brown
26 Attorneys for Plaintiff
27 Ticketmaster, L.L.C.
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